

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-002379

Ronald Coulter, #300410,

Appellant,

v.

State of South Carolina,

Respondent.

REPLY BRIEF

Ronald Coulter, #300410

BRCI Wateree 195

4460 Broad River Road

Columbia, SC 29210

Appellant, Pro Se

RECEIVED

NOV 05 2014

SC Court of Appeals

TABLE OF CONTENTS

Table of Authorities	ii
Argument	
1. THE ARGUMENTS SUBMITTED BY THE RESPONDENT ARE INSUFFICIENT TO FACE THE STATEMENT OF ISSUES AS PRESENTED IN THE APPELLANT'S INITIAL BRIEF ON APPEAL.	1
Conclusion	2

TABLE OF AUTHORITIES

CASES

<u>Boyer v. Loftin-Woodard, Inc.</u> , 146 S.E.2d 606 (1966)	1
<u>Brady v. Brady</u> , 72 S.E.2d 193 (1952)	1
<u>Fruehauf Trailer Co. v. McElmurray</u> , 113 S.E.2d 756 (1960)	1
<u>Hewitt v. Reserve Life Ins. Co.</u> , 110 S.E.2d 852 (1959)	1
<u>Shell v. Brown</u> , 134 S.E.2d 214 (1963)	1
<u>Solley v. Weaver</u> , 146 S.E.2d 164 (1966)	1
<u>Winter v. U.S. Fidelity & Guaranty Co.</u> , 126 S.E.2d 724 (1962)	1

OTHER AUTHORITIES

ARGUMENT

I. THE ARGUMENTS SUBMITTED BY THE RESPONDENT ARE INSUFFICIENT TO FACE THE STATEMENT OF ISSUES AS PRESENTED IN THE APPELLANT'S INITIAL BRIEF ON APPEAL.

The Respondent has attempted to diminish the nature of the Appellant's Fourteenth Amendment due process claims raised on appeal by truncated quotations from the Appellant's supporting arguments contained within his original petition for state habeas corpus. The Respondent contends that the Appellant raised the following claims to the lower court: 1) whether the state PCR court improperly adjudicated his Sixth Amendment ineffectiveness claims; and, 2) whether his PCR counsel rendered inadequate representation during his PCR proceeding.

Every ground of appeal ought to be so distinctly stated that the courts may at once see the point which it is called upon to decide without having to "grope in the dark" to ascertain the precise point at issue. Brady v. Brady, 72 S.E.2d 193 (1952), Hewitt v. Reserve Life Ins. Co., 110 S.E.2d 852 (1959), Fruehauf Trailer Co. v. McElmurray, 113 S.E.2d 756 (1960), Winter v. U.S. Fidelity & Guaranty Co., 126 S.E.2d 724 (1962), Shell v. Brown, 134 S.E.2d 214 (1963), Solley v. Weaver, 146 S.E.2d 164 (1966), Boyer v. Loftin-Woodard, Inc., 146 S.E.2d 606 (1966).

The arguments presented in the Brief of Respondent do not address the issues which are clearly stated on appeal; therefore, the Respondent's arguments are without merit.

CONCLUSION

Based on the claims and arguments advanced in the Initial Brief of Appellant, it is respectfully submitted that this Court should reverse the lower court's dismissal of the Appellant's Petition for Writ of State Habeas Corpus.

November 2, 2014

Respectfully submitted,

Ronald Coulter

Ronald Coulter, #300410
BRCI Wateree 195
4460 Broad River Road
Columbia, SC 29210

Appellant, Pro Se

STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

NOV 05 2014

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-002379

Ronald Coulter, #300410,

Appellant,

v.

State of South Carolina,

Respondent.

PROOF OF SERVICE

I certify that I have served the Reply Brief on the State of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on November 3, 2014, addressed to the attorney of record, Ashleigh R. Wilson, Asst. Attorney General, Post Office Box 11549, Columbia, South Carolina 29211.

November 2, 2014



Ronald Coulter, #300410
BRCI Wateree 195
4460 Broad River Road
Columbia, SC 29210

Appellant, Pro Se

Ronald Coulter #300410
BRCI Wateree 195
4460 Broad River Rd
Columbia, SC 29210

RECEIVED

NOV 04 2014

BRCI
MAILROOM

LEGAL
MAIL

29211162929

COLUMBIA SC 292

04 NOV 2014 PM 21

RECEIVED

NOV 05 2014

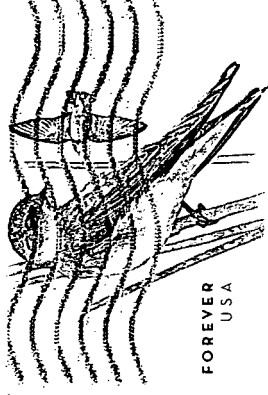
SC Court of Appeals

Clerk of Court
SC Court of Appeals

P.O. Box 11629

Columbia, SC

29211



FOREVER
USA

Bank Swallow

THE DEPARTMENT OF CORRECTIONS HAS NEITHER
CENSORED NOR REVIEWED THE CONTENTS THEREFORE
THE DEPARTMENT DOES NOT ASSUME RESPONSIBILITY
FOR ITS CONTENTS

WOODEN
BROADWAY
S.C. DEPARTMENT OF CORRECTIONS



SUSTAINABLE
FORESTRY
INITIATIVE

Certified Fiber Sourcing
www.sfiiprogam.org

THIS ENVELOPE IS RECYCLABLE AND MADE WITH 30% POST CONSUMER CONTENT



© USPS 2012